

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
EASTERN DIVISION**

United States of America,

Plaintiffs,

vs.

Gerald James Cree, Jr.,

Defendant.

**REQUEST FOR NOTICE PURSUANT
TO FED. R. EVID. 609(b)**

Case No.: 3:23-CR-00037

The Defendant above named, Gerald James Cree, Jr., and by and through his attorney Nicole L. Bredahl, Barkus Law Firm, P.C., requests that the U.S. Attorney provide the undersigned with notice, pursuant to FED. R. EVID., 609 (b), of any conviction or convictions with respect to which a period of more than ten (10) years has elapsed since the date of the conviction, which the United States intends to offer at trial for the purpose of attacking the credibility of the Defendant or any witness, sufficiently in advance of trial so the Defendant is afforded a fair opportunity to contest the use of the evidence. The Defendant requests that notice of any conviction or convictions subject to the requirements of FED. R. EVID. 609 be provided no later than the deadline set by the Court for the disclosure of discovery by the government or, if no order setting a deadline for the government's disclosure of discovery is entered, no later than fifteen (15) days before trial.

Dated this day March 6, 2023.

Respectfully submitted,

BARKUS LAW FIRM, P.C.



Nicole L. Bredahl, ND ID # 08467
3431 4th Avenue S., Suite 201
Fargo, ND 58103
Tele: (701) 532-2498
Fax: (701) 298-9362
Email: nicole@barkuslawfirm.com
Email service: eservice@barkuslawfirm.com
ATTORNEYS FOR DEFENDANT